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Attorney for Debtors

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MONTANA

IN RE:	)	Case No. 15-60690
	)	
DALE W. MEYERS and	)	<u>MOTION TO DISMISS</u>
TERRI L. MEYERS	)	<u>AND WAIVE NOTICE PERIOD</u>
	)	
Debtors	)	

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Pursuant to Rule 1017, F.R.B.P., and Mont. LBR 1017-1(a), the Debtors above named, Dale W. Meyers and Terri L. Meyers, by and through their attorney Juliane E. Lore, respectfully move the Court to dismiss this case, and waive the 14-day notice period. The grounds for this request are because the case was filed without completion of all preparatory work required for a case that is accurate and provides relief to the debtors, and they are not compliant in post-petition payments to secured lenders in addition to problems with allowed exemptions and other issues. In order to cure these deficiencies and file a case that will result in a confirmable plan and result in a discharge, the debtors wish to dismiss the current case in anticipation of refiling within thirty days.

The debtors request the waiver of the fourteen day notice period in order to conduct transactions and work with secured lenders outside of the bankruptcy stay in a matter in which

the sheriff sale of property containing a gravel pit may otherwise occur, significantly decrease their business income. In order to file a case that accurately discloses all business interests and associated property, and maintain ownership and control of the property from which the income must be derived for the success of their consecutive chapter 13 filing, the debtors request the waiver of notice and immediate entry of the order dismissing this matter. The Chapter 13 Trustee assigned has been contacted regarding this matter and has no objection.

WHEREFORE, the undersigned moves the Court for a waiver of the 14 day notice period, and Order of Dismissal.

DATED THIS 22nd day of October, 2015.

**LORE LAW FIRM, P.L.L.C.**  
PO Box 1105  
Lewistown, MT 59457

By: /s/ Juliane E. Lore  
JULIANE E. LORE  
Attorney for Debtors

**CERTIFICATE OF SERVICE**

I, the undersigned, do hereby certify under penalty of perjury that a copy of the foregoing Motion to Dismiss was sent by first class mail postage prepaid on the 22nd day of October, 2015, to the following:

JIM HUSKEY  
AMERICAN BUILDERS CONST  
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BILLINGS, MT 59101

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Internal Revenue Service  
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MT Department of Revenue  
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/s/ Juliane E. Lore  
For LORE LAW FIRM PLLC